

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

CHRISTOPHER IRWIN,
PLAINTIFF.

FILED

VS.

WASHINGTON COUNTY
CORRECTIONAL FACILITY
et al., DEFENDANTS.

'06 JUN 27 11:27 C.A. NO. 04-246 ERIE
CLERK
U.S. DISTRICT COURT

MOTION FOR APPOINTMENT OF COUNSEL

Pursuant to 28 U.S.C. § 1915 (d) Plaintiff CHRISTOPHER IRWIN moves for an order appointing counsel to represent him in this case. In support of this motion, Plaintiff states:

1. Plaintiff is unable to afford counsel. He has requested leave to proceed in forma pauperis.
2. Plaintiff's imprisonment will greatly limit his ability to litigate. The issues involved in this case are complex, and will require significant Discovery research and investigation.
3. Plaintiff has little knowledge of the Discovery process and the litigation process, Plaintiff has a mental disability, A.D.D. that prevents him from being able to comprehend the processes of the laws in this complex case.
4. The case involves medical issues that will require expert testimony, to cross-examine medical witnesses called by the Defendants or other issues that would require expert testimony. Due to the Plaintiffs claims that involves denial of medical treatment once prescribed.
5. A trial in this case will likely involve conflicting testimony, and counsel would better enable plaintiff to present evidence and cross examine witnesses.
6. PLAINTIFF DEMANDS JURY TRIAL.

WHEREFORE, plaintiff requests that the court appoint _____,
A member of the _____ Bar, as counsel in this case.

Dated: June 19, 2006

Respectfully submitted,
By: Christopher Irwin